

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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IN RE: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	Master File No. 12-md-02311
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	:	
This Document Relates to:	:	Hon. Marianne O. Battani
	:	
ALL DEALERSHIP ACTIONS	:	
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**AUTO DEALERS' MOTION FOR AN EXTENSION  
OF THE ROUND FOUR CLAIM-FILING DEADLINE**

Co-Lead Class Counsel for the Auto Dealers move the Court for an extension of the April 17, 2020 deadline to file claims in the Round Four settlements. This motion is brought to allow new car dealerships extra time to complete their claim filings, which may have been impeded by the COVID-19 public health emergency.

Dated: April 15, 2020

By: /s/ Gerard V. Mantese  
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*Interim Co-Lead Counsel for the Automobile Dealer Plaintiffs*

**CERTIFICATE OF SERVICE**

I, GERARD V. MANTESE, HEREBY CERTIFY THAT I CAUSED A TRUE AND CORRECT COPY OF **AUTO DEALERS' MOTION FOR AN EXTENSION OF THE ROUND FOUR CLAIMS-FILING DEADLINE** TO BE SERVED VIA E-MAIL UPON ALL REGISTERED COUNSEL OF RECORD VIA THE COURT'S CM/ECF SYSTEM ON **April 15, 2020.**

/s/ Gerard V. Mantese  
GERARD V. MANTESE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
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	:	Master File No. 12-md-02311
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**MEMORANDUM IN SUPPORT OF AUTO DEALERS' MOTION  
FOR AN EXTENSION  
OF THE ROUND FOUR CLAIM-FILEING DEADLINE**

Co-Lead Class Counsel for the Auto Dealers believe that an extension of the April 17, 2020 deadline to file claims in the Round Four settlements is appropriate considering the COVID-19 public health emergency. Toward the end of the existing claim-filing period, the COVID-19 pandemic became widespread in the United States. The resulting business and community restrictions may have impacted the ability of some dealerships to file claims and will likely continue to affect claim filing for the near future.

Co-Lead Counsel for the Auto Dealers have consulted with the claims administrator, who confirmed that some potential settlement class members have inquired about an extension of the Round Four claim deadline. Representatives of other dealerships have directly contacted Co-Lead Counsel to report difficulties in perfecting claims because of stay-at-home and similar orders issued by most states. Co-Lead Class Counsel for the Auto Dealers therefore believe that the Round Four deadline to file claims should be extended to June 12, 2020.

Dated: April 15, 2020

By: /s/ Gerard V. Mantese

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/s/ Gerard V. Mantese

GERARD V. MANTESE